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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

IN RE META PIXEL TAX FILING CASES

Case No. 5:22-cv-07557-PCP (VKD)

This Document Relates To:

All Actions

**DEFENDANT META PLATFORMS,  
INC.'S ADMINISTRATIVE MOTION  
TO CONSIDER WHETHER ANOTHER  
PARTY'S MATERIALS SHOULD BE  
SEALED FOR MOTION**

Hon. P. Casey Pitts

Defendant Meta Platforms, Inc. (“Meta”) certifies that it has reviewed and complied with the Court’s Standing Order on Administrative Motions to File Under Seal and Civil Local Rule 79-5. Pursuant to Civil Local Rule 79-5(f), and the Stipulated Protective Order entered by the Court on May 16, 2023 (ECF No. 73), Meta requests that the Court consider whether information designated by plaintiffs as Confidential should be sealed in connection with Defendant Meta Platforms, Inc.’s Motion to Exclude the Expert Report and Testimony of Robert Zeidman (“Motion to Exclude”) and Exhibits 1 and 2 to the Declaration of Jessica Stebbins Bina in Support of Defendant Meta Platforms, Inc.’s Motion to Exclude the Expert Report and Testimony of Robert Zeidman, as outlined below.

The materials below are either designated Confidential by plaintiffs or are still within the 21-day period under the Stipulated Protective Order in which they must be treated as highly confidential so that the Parties have an opportunity to designate them; with respect to the latter, Meta files them under seal consistent with the Stipulated Protective Order so plaintiffs may have an opportunity to request sealing if so designated.

Document	Designating Party	Portion(s) to be Sealed
Motion to Exclude	Time to designate has not yet run  (highlighted in yellow)	2:4-5; 2:12-15; 2:19-22; 4:14-16; 5:10-11; 5:18-25; 6:4-6; 6:19-21; 7:8-9; 7:13-15; 7:16-20; 7:26-27; 8:4-7; 8:16-26; 9:1-4; 9:6-23; 9:26-28; 10:1-3; 10:9-13; 10:17-26; 11:2-5; 11:7-13; 11:15-22; 11:28-12:6; 12:14-15; 12:20-25; 13:5-6; 13:26-28; 14:1; 14:13-16; 14:20-26; 15:2-15; 15:19-28; 16:1-3; 16:8-10; 16:16-22; 16:27-28; 17:4-10; 17:28-18:5; 18:7-8; 18:15-19; 18:21-23; 19:11-12; 18:15-

		16; 19:27-28; 20:5-19; 20:23-28; 21:1-4
Exhibit 1	Time to designate has not yet run.	Entire Document.
Exhibit 2	Plaintiffs	Entire Document.

DATED: October 27, 2025

LATHAM & WATKINS LLP

By: /s/ Jessica Stebbins Bina

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